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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

☐ Affects PG&E Corporation      **Debtors.**  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**FOURTH SUPPLEMENTAL DECLARATION OF  
JAMES MESTERHARM OF AP SERVICES, LLC**

Related Doc: Dkt. Nos. 867, 868, 1299, 1342, 1773,  
4718

Pursuant to 28 U.S.C. § 1746, I, James Mesterharm, state under penalty of perjury, that:

1. I am a Managing Director of AlixPartners, LLP (“**AlixPartners**”), which has a place of  
business at 909 Third Avenue, Floor 30, New York, New York 10022.

2. I am duly authorized to execute this fourth supplemental declaration on behalf of AP  
Services, LLC (“**APS**”), an affiliate of AlixPartners LLP.

3. Except as otherwise noted, I have personal knowledge of the matters set forth herein and,  
if called as a witness, would testify competently thereto.

4. I am filing this fourth supplemental declaration to supplement the disclosures that were  
included in my original declaration dated March 13, 2019 [ECF No. 867], my supplemental declaration  
dated April 11, 2019 [ECF No. 1342], my second supplemental declaration dated May 1, 2019 [ECF No.  
1773], and my third supplemental declaration dated November 13, 2019 [ECF No. 4718].

5. Unless otherwise noted, references to AP below collectively refer to AP Holdings, LLP,  
APS, and each of their respective subsidiaries. APS wishes to disclose the following:

- Albertsons Companies, Inc., notice of appearance party in this bankruptcy matter, and affiliates (Albertsons) are adverse parties, affiliates, litigation parties and related parties to current and former AP clients in matters unrelated to the Debtors.
- Gibson Dunn & Crutcher (“**Gibson Dunn**”), an ad hoc committee of holders of trade claims in this bankruptcy matter, is opposing counsel, professional and vendor to current and former AP clients in matters unrelated to the Debtors. Gibson Dunn is a current and former AP client in matters unrelated to the Debtors. Gibson Dunn is a former employer of current AP employees. Gibson Dunn provides legal services to AP.
- Hyundai Corporation USA, a notice of appearance party in this bankruptcy matter, and affiliates (“**Hyundai**”) are adverse parties, adverse litigation parties, litigation parties, creditors, bondholders, insurance providers, director-affiliated companies, contract parties, vendors, customers, and related parties to current and former AP clients in matters unrelated to the Debtors. Hyundai is a former employer of a current AP employee.
- Riverstone, a subrogation claimant in this bankruptcy matter, is a contract party, creditor, shareholder, investor, lender, adverse litigation party and parent company to current and former AP clients in matters unrelated to the Debtors. Riverstone is a current AP client in matters unrelated to the Debtors.
- RSUI Group, a subrogation claimant in this bankruptcy matter, and affiliates, are bondholders, litigation parties, insurance providers, lenders, and adverse litigation parties to current and former AP clients in matters unrelated to the Debtors.
- Safeway Inc., a notice of appearance party in this bankruptcy matter, and affiliates are related parties, adverse litigation parties and parties to current and former AP clients in matters unrelated to the Debtors.
- Silver Rock Financial LP, a 2019 statement party in this bankruptcy matter, is a bondholder and related party to current and former AP clients in matters unrelated to the Debtors.
- Standard Fire Insurance Company, a subrogation claimant in this bankruptcy matter, is a limited partner to a current AP client in matters unrelated to the Debtors.
- Strategic Value Partners, a subrogation claimant in this bankruptcy matter, and affiliates (“**SVP**”) are litigation parties, bondholders, creditors, lenders, and noteholders to current and former AP clients in matters unrelated to the Debtors. SVP is a current and former AP client in matters unrelated to the Debtors.

APS does not believe that the fourth supplemental disclosures above impact its disinterestedness.

I continue to reserve the right to supplement APS’ disclosures in the event that APS discovers any additional connections that require disclosure. If any new material relevant facts or relationships are

1 discovered or arise, APS will promptly file a supplemental declaration pursuant to Bankruptcy Rule  
2 2014(a).

3 I declare under penalty of perjury pursuant to 28 U.S.C. §1746 that the foregoing is true and  
4 correct.

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7 Dated: January 2, 2020

AP Services, LLC

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11 James Mesterharm  
12 Authorized Representative  
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